

# EXHIBIT 1

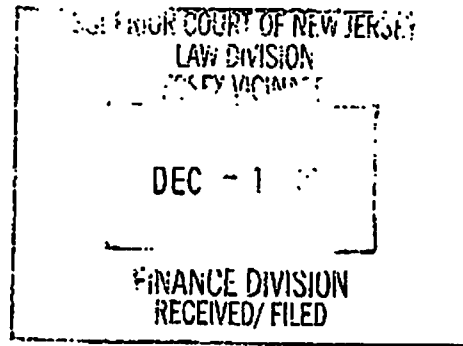
ALAN BERLINER, ESQ.  
ROBERT TREAT CENTER  
50 PARK PLACE  
11<sup>TH</sup> FLOOR  
NEWARK NJ 07102  
(973) 643-6939  
ATTORNEY FOR PLAINTIFF(S)  
SHARON JACKSON

Plaintiff,

vs.

TRUSTY MAZIE, MD, JOHN DOES, MDS  
AND JANE ROES, RNS

Defendant,



SUPERIOR COURT OF NEW JERSEY

LAW DIVISION - ESSEX COUNTY

DOCKET NO. ESX-L-9535-11

Civil Action

COMPLAINT AND JURY DEMAND

Plaintiff, Sharon Jackson residing at 839 Frelinghuysen Avenue, Newark, New Jersey, by way of Complaint, says:

1. On or about May 11, 2011, the plaintiff, Sharon Jackson was seen and examined by defendant Trusty Mazie, MD, John Does, MDS and/or Jane Roes, RNS, at 101 Ludlow Street, Newark, New Jersey, which is the office of Sirpurapu Padma, MD. Defendant Trusty Mazie, MD was standing in for Dr. Padma. Plaintiff's chart record indicated she was allergic to sulfar and aspirin. Defendant Trusty Mazie, MD prescribed trimetho/sulfamethox for plaintiff. Plaintiff took this prescribed medication and developed severe hives all over her body. Plaintiff later learned this medication contained sulfar.

2. At the time aforesaid, the defendants, Trusty Mazie, M.D., John Does, MDS, Jane Roes, RNS, did fail to exercise the degree of care or skill, or failed to possess the degree of knowledge ordinarily possessed and exercised by others in the business and/or profession of medicine and nursing and the defendants, Trusty Mazie, M.D., John Does, MDS, Jane Roes, RNS, did negligently and careless treat and care for the plaintiff by

prescribing trimetho/sulfamethox which caused her to develop bives all over her body and scarring.

3. As a result of the aforementioned acts of the defendants, Trusty Mazie, M.D., John Does, MDS, Jane Roes, RNS, the plaintiff did sustain severe and permanent injuries to her skin and other parts of her body; she will be required to expend great sums of money in an attempt to cure herself; she was unable to continue in her normal course of duties, activities and conjugal relationship with her spouse; and she was otherwise injured.

WHEREFORE, plaintiff, Sharon Jackson, demands judgment against the defendants, Trusty Mazie, M.D., John Does, MDS, Jane Roes, RNS, jointly, severally or in the alternatives, together with costs of suit.

By: Alan Berliner

ALAN BERLINER, ESQ.

Dated: November 4, 2011

## EXHIBIT 2

PAUL J. FISHMAN  
United States Attorney  
By: JORDAN M. ANGER  
Assistant United States Attorney  
970 Broad Street, Suite 700  
Newark, New Jersey 07102  
(973) 645-2829 (tel.)  
(973) 297-2010 (fax)  
jordan.anger@usdoj.gov

Document Electronically Filed

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

SHARON JACKSON,

*Plaintiff,*

v.

TRUSTY MAZIE, MD, ET AL.,

*Defendants.*


*Civil Action No. ESX-L-9539-11*

CERTIFICATION OF  
SCOPE OF EMPLOYMENT

I, Daniel J. Gibbons, Deputy Chief, Civil Division, United States Attorney's Office for the District of New Jersey, acting pursuant to 28 U.S.C. § 2679(d)(2), and by virtue of the authority vested in me by 28 C.F.R. § 15.4, certify that I have read the complaint in this action and all attachments thereto. On the basis of the information now available with respect to the allegations therein, I find that the individual defendant, Trusty Mazie, was acting within the scope of her employment as an employee of the United States at the time of the conduct alleged in the complaint.

PAUL J. FISHMAN  
United States Attorney

By:

  
DANIEL J. GIBBONS  
Deputy Chief, Civil Division